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February 15, 2007

**BY E-FILING**

The Honorable Gregory M. Sleet  
United States District Court  
for the District of Delaware  
844 King Street  
Wilmington, DE 19801

Re: Automotive Technologies International, Inc. v. American Honda  
Motor Co., Inc., et al., C.A. No. 06-187-GMS

Dear Judge Sleet:

In anticipation of the discovery conference scheduled for Friday, February 16, 2007, 2:00 p.m., we submit the following agenda items to be presented to the Court. (We did not receive comments from plaintiff on the content of the issues in this letter except an indication that plaintiff will not oppose the stay.)

Defendants' Issues:

1. A stay of this suit pending re-examination of the patents-in-suit.
2. The need for a prosecution bar in the Protective Order and the question of access to confidential information by mock jurors and jury consultants;
3. The adequacy of the descriptions on ATI's privilege log;
4. The library of prior art maintained by ATI and documents showing the timing and manner by which this art was acquired (Document Request No. 6);
5. Documents in ATI's possession or control concerning the '022 patent (Document Request No. 35);

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6. Documents in ATI's possession or control concerning agreements and/or licenses pertaining to the field of technology relevant to this suit, which are subject to confidentiality agreements with third parties (Document Request No. 86);
7. Documents in the possession or control of ATI or the inventors of the patents-in-suit relating to the allegations in this case, including any documents relating to any financial interest that any named inventor may have (or had) in ATI, the patents, or this litigation (Document Request No. 109);
8. The status of ATI's production of the document it has agreed to produce in response to document requests (Requests Nos. 13, 45, 99, and 101) and subpoenas to the prosecuting attorneys, and supplementation of interrogatory responses (Interrogatory Nos. 4 and 5);
9. The adequacy of ATI's discovery response concerning secondary considerations relevant to obviousness (Interrogatory No. 9);
10. The adequacy of ATI's proposed claim constructions for the patents-in-suit (Interrogatory No. 1); and
11. ATI's objections to defendants' second set of document requests.

Respectfully,

A handwritten signature in black ink, appearing to read "Thomas C. Grimm". The signature is fluid and cursive, with a large initial "T" and "G".

Thomas C. Grimm (#1098)

TCG

cc: Dr. Peter T. Dalleo, Clerk (by hand)  
Richard K. Herrmann, Esquire (by e-filing & e-mail)  
Timothy Q. Delaney, Esquire (by e-mail)  
Andrew Kochanowski, Esquire (by e-mail)  
Michael H. Baniak, Esquire (by e-mail)